

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED:** \_\_\_\_\_

**ERNEST JURIEL, a/k/a "Chop,"** : **VIOLATIONS:** 18 U.S.C. § 371  
**EDWARD M. GILLIARD** (conspiracy - 1 count)  
18 U.S.C. § 2119  
(carjacking - 1 count)  
18 U.S.C. § 1951(a)  
(Hobbs Act robbery -  
1 count)  
18 U.S.C. § 924(c)  
(brandishing  
a firearm in connection  
with a crime of violence  
1 count)  
18 U.S.C. § 2  
(aiding and abetting)  
Notice of Additional  
Factors

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. On or about July 3, 2001, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**ERNEST JURIEL, a/k/a "Chop,"**  
**and**  
**EDWARD M. GILLIARD**

conspired and agreed, together and with Harold Stanley and John Harris, charged elsewhere, to commit

various offenses against the United States, that is:

- (1) with the intent to cause death and serious bodily harm, to take from the person and presence of another, by force and violence and by intimidation, a motor vehicle that had been transported, shipped and received in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2119; and
- (2) to commit robbery, which would obstruct, delay and affect commerce, and the movement of articles and commodities in interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

#### **THE MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that:

2. Defendants EDWARD M. GILLIARD and ERNEST JURIEL, a/k/a “Chop,” and John Harris and Harold Stanley agreed to rob Craig Electric at 208 North Felton Street, Philadelphia.
3. John Harris and Harold Stanley used loaded revolvers and threats to hold victims hostage.
4. Defendant GILLIARD acted as a lookout and getaway driver.
5. Defendant JURIEL used his position as an employee of Craig Electric to help set up the robbery and assisted Harris and Stanley in removing items from the business.
6. John Harris, at gunpoint, forced Victim G to drive Victim C’s 1999 Dodge Dakota truck to the Mellon Bank, located at 63<sup>rd</sup> and Callowhill Streets, in Philadelphia, while Harold Stanley held Victim C hostage at gunpoint, and defendant JURIEL removed items from the business.

7. John Harris waited in the truck, and forced Victim G to go into the bank and attempt to cash a check, which Harold Stanley had forced Victim C to write at gunpoint.

8. Harold Stanley forced Victim C at gunpoint to write another check when Victim G was unable to cash the first check.

9. John Harris forced Victim C at gunpoint to drive Victim C's 1999 Dodge Dakota truck to the Mellon Bank, located at 63<sup>rd</sup> and Callowhill Streets, in Philadelphia, while Harold Stanley held Victim G hostage at gunpoint. Defendant GILLIARD remained outside 208 North Felton Street, in Philadelphia as a lookout and getaway driver.

10. John Harris waited in the truck, and forced Victim C to go into the bank and attempt to cash the second check.

11. Defendant JURIEL remained at 208 North Felton Street, in Philadelphia and removed items from the business.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts were committed in the Eastern District of Pennsylvania.

On or about the afternoon of July 3, 2001,

1. Defendant JURIEL, and employee of Craig Electric notified John Harris that it was time to enter the store to commit the robbery.

2. Defendant JURIEL left the door unlocked at the business located at 208 North Felton Street, in Philadelphia.

3. John Harris and Harold Stanley entered Victim C's business located at 208 North Felton Street, in Philadelphia.

4. Defendant GILLIARD waited outside the business in a car, acting as a getaway driver and lookout.

5. John Harris and Harold Stanley pointed loaded revolvers at Victim C and Victim G and demanded money.

6. Defendant JURIEL assisted Harris and Stanley in removing items from the business and taking them to the car where defendant GILLIARD was waiting.

7. Harold Stanley demanded that Victim C write a check to obtain money from Victim C's bank account.

8. John Harris, at gunpoint, forced Victim G to drive Victim C's 1999 Dodge Dakota truck to the Mellon Bank, located at 63<sup>rd</sup> and Callowhill Streets, in Philadelphia, while Harold Stanley, at gunpoint, held Victim C hostage.

9. John Harris and Harold Stanley threatened to shoot the victims if they did not comply with the defendants' orders.

10. John Harris waited in the truck, and forced Victim G to go into the bank and attempt to cash the check, which Harold Stanley had forced Victim C to write at gunpoint.

11. Harold Stanley forced Victim C to write another check at gunpoint, when Victim G and John Harris returned from the bank having been unable to cash the first check.

12. John Harris forced Victim C at gunpoint to drive his 1999 Dodge Dakota truck to the Mellon Bank, located at 63<sup>rd</sup> and Callowhill Streets, in Philadelphia, while Harold Stanley held Victim G hostage at gunpoint. When Victim G attempted to explain that the bank was crowded, Harold Stanley told Victim G not to say anything, and that she had only ten minutes to live.

13. John Harris waited in the truck, and forced Victim C to go into the bank and

attempt to cash the second check.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 3, 2001, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**ERNEST JURIEL, a/k/a “Chop,”  
and  
EDWARD M. GILLIARD**

and Harold Stanley and John Harris, with intent to cause death and serious bodily injury, aided and abetted and took from the person and presence of another, by force and violence and by intimidation, a motor vehicle – that is, a 1999 Dodge Dakota truck – that had been transported, shipped and received in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations set forth in paragraphs 2 - 11 of Count One are realleged here.
2. On or about July 3, 2001, at Philadelphia, in the Eastern District of Pennsylvania,

defendants

**ERNEST JURIEL, a/k/a “Chop,”  
and  
EDWARD M. GILLIARD**

and Harold Stanley and John Harris, knowingly and unlawfully aided and abetted and attempted to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery and extortion, in that they attempted to obtain money belonging to Craig Electric, a business engaged in interstate commerce, in the presence of employees of that business, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property.

In violation of Title 18, United States Code, Section 1951(a) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations set forth in paragraphs 2 - 11 of Count One are realleged here.
2. On or about July 3, 2001, at Philadelphia, in the Eastern District of

Pennsylvania, defendants

**ERNEST JURIEL, a/k/a “Chop”  
and  
EDWARD M. GILLIARD,**

with each other and with Harold Stanley and John Harris, knowingly used and carried firearms and aided and abetted the use and carrying of firearms, that is two handguns, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to interfere with interstate commerce by robbery and armed car jacking, in violation of Title 18, United States Code, Sections 1951 and 2119.

In violation of Title 18, United States Code, Section 924(c).

**NOTICE OF ADDITIONAL FACTORS**

**THE GRAND JURY FURTHER CHARGES THAT:**

In committing the offense charged in this indictment, the defendants

**ERNEST JURIEL, a/k/a “Chop,”  
and  
EDWARD M. GILLIARD**

1. Committed an offense in which the property of a financial institution was taken, and in which the taking of such property was an object of the offense, as described in U.S.S.G. § 2B3.1(b)(1).
2. Committed an offense in which a firearm was brandished, and possessed, as described in U.S.S.G. § 2B3.1(b)(2)(C).
3. Committed an offense in which a threat of death was made, as described in U.S.S.G. § 2B3.1(b)(2)(F).
4. Committed an offense in which any person was abducted to facilitate commission of the offense and to facilitate escape, as described in U.S.S.G. § 2B3.1(b)(4)(A).
5. Committed an offense in which any person was physically restrained to facilitate commission of the offense and to facilitate escape, as described in U.S.S.G. § 2B3.1(b)(4)(B).
6. Committed an offense involving carjacking, as described in U.S.S.G. § 2B3.1(b)(5).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**

**United States Attorney**